

MAY 12 2021

Clerk, U.S. District Court  
Texas Eastern

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

V.

MELONIE MECHELLE JACKSON (7)

SEALED

No. 4:21-CR- 26

Judge

21-CR-126  
Jordan

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute Marijuana)

That from sometime in or about January 2017, and continuously thereafter up to and including May 12, 2021, in the Eastern District of Texas and elsewhere,

[REDACTED]  
[REDACTED]  
**Melonie Mechelle Jackson**  
[REDACTED]  
[REDACTED]

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

**Count Two**

Violation: 18 U.S.C. § 1956(h)  
(Conspiracy to Commit Money  
Laundering in violation of 18 U.S.C.  
§§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i))

That from sometime in or about January 2017, and continuously thereafter up to and including May 12, 2021,

[REDACTED]  
[REDACTED]  
defendants, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, to-wit:

1. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce that involved the proceeds of a specified unlawful activity, that is,

Conspiracy to Possess with the Intent to Distribute a Controlled Substance, as described in Count One of this Indictment, with the intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i);

2. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce that involved the proceeds of a specified unlawful activity, that is, Conspiracy to Possess with Intent to Distribute a Controlled Substance, as described in Count One of this Indictment, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i);

All in violation of 18 U.S.C. § 1956(h).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

[REDACTED]

[REDACTED]

\$6,188 in U.S. currency seized from [REDACTED]; and

\$17,200 in U.S. currency seized from [REDACTED].

A TRUE BILL

\_\_\_\_\_  
GRAND JURY FOREPERSON

NICHOLAS J. GANJEI  
ACTING UNITED STATES ATTORNEY

\_\_\_\_\_  
HEATHER RATTAN  
Assistant United States Attorney

\_\_\_\_\_  
Date



Penalty: Not more than 20 years imprisonment; a fine not to exceed \$500,000 or twice the pecuniary gain or loss, and a term of supervised release of not more than 3 years.

Special Assessment: \$100.00